

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Application of

06 Civ. 3438 (PKC)(FM)

JOHN ERIC BOLTON,

Petitioner,

For an Order of Attachment in Aid of Arbitration Pursuant
to Rule 64 of the Federal Rules of Civil Procedure and
CPLR § 7502(c),

-against-

VENACA, INC.,

Respondent.

**DECLARATION OF
HEATHER SHANKWILER**

Heather Shankwiler, hereby declares and states as follows:

1. I was employed by Venaca, Inc. ("Venaca") from April, 2005 through January, 2007 as an on-site project manager in Atlanta, Georgia. I was recruited, interviewed, and ultimately hired by John Eric Bolten.
2. I have read the allegations contain in Paragraph 19 of the May 21, 2007 Affidavit of George Grippo wherein he asserts that Venaca assigned a "keeper" to Eric "to monitor his progress and remind him of the tasks he needed to perform and ensure that he followed-up."
3. Mr. Grippo's assertions are absolutely false.
4. It appears that Mr. Grippo's use of the word "keeper" is taken from my March 28, 2006 e-mail to Eric's Administrative Assistant, Wasiqa Qasuria (Exhibit 5 to Mr. Grippo's Affidavit) which contains a list of current open projects at the time Eric and I were working on. That list, however, was an effort by Eric and myself to put on paper

our open projects before I started my vacation. I naturally called Ms. Qasuria the "keeper" of the list because she was Eric's Administrative Assistant.

5. Mr. Grippo's attempt to spin out of context my March 28, 2006 e-mail is particularly disingenuous given that he knew nothing about it or its context.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: Atlanta, Georgia
May 22, 2007

Heather S. Shankwiler
Heather Shankwiler